

Judicial Assignment: Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MAPLE LEAF HOUSING
INVESTMENTS, LLC, a Washington
company,

Plaintiff,

vs.

TEXACO DOWNSTREAM PROPERTIES
Inc., a Delaware corporation,

Defendant.

Case No. 2:18-cv-01710-RSL

**STIPULATED MOTION AND
ORDER EXTENDING TIME FOR
RESPONSIVE PLEADING**

Pursuant to the order entered by this Court on the stipulation between Plaintiff MAPLE LEAF HOUSING, INVESTMENTS, LLC's ("Plaintiff") and Defendant TEXACO DOWNSTREAM PROPERTIES INC. ("Defendant"), Defendant's responsive pleading is due March 22, 2019. *See*, Dkt. # 27. Plaintiff and Defendant now jointly move under FRCP 6(b) for an additional 7-day extension of Defendant's deadline to file a responsive pleading to March 29, 2019, to allow an agreement resolving several of Plaintiff's claims to be executed.

As previously reported to the Court, Dkt. # 26, Plaintiff and Defendant have reached an agreement to resolve issues raised in Defendant's November 30, 2018, meet and confer correspondence ("Meet and Confer Correspondence"). Further, the parties

1 agreed, subject to the Court's approval, to stay all litigation deadlines and activities for
2 120 days while an environmental investigation is jointly undertaken at Plaintiff's
3 property (the "Agreement"). The counsel for the parties recently finalized the settlement
4 document in connection with the Agreement and are in the process of obtaining client
5 signatures for the settlement document.

6 Pursuant to FRCP Rule 6(b), the Court may, for good cause, extend the time
7 for Defendant to respond to Plaintiff's Complaint. There is good cause for granting an
8 extension because Plaintiff and Defendant require additional time to execute the final
9 settlement document. The parties jointly request a 7-day extension of Defendant's
10 deadline to file a responsive pleading to allow the parties to: (1) execute their settlement
11 document, and (2) present to this Court the stipulated order necessary to stay the subject
12 litigation and related deadlines while an environmental investigation is jointly undertaken
13 at Plaintiff's property.

14 Based on the foregoing, Plaintiff and Defendant jointly request that the Court
15 issue an order extending the deadlines for Defendant's responsive pleading seven days to
16 March 29, 2019.

17 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD

18
19 Dated: March 22, 2019, 2019

ROGERS JOSEPH O'DONNELL, PC

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21 By: /s/ Robert C. Goodman

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INC.

1 Dated: March 22, 2019

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14 I attest that concurrence in the filing of this document has been obtained from
15 David F. Stearns, counsel for Maple Leaf Housing Investments, LLC.

16 Dated: March 22, 2019

ROGERS JOSEPH O'DONNELL

17 By: /s/ Robert C. Goodman
18 ROBERT C. GOODMAN
19 Attorneys for Defendant
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Defendant's responsive pleading shall be filed no later than March 29, 2019.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 27th day of March, 2019.

Robert S. Lasnik
United States District Judge